

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:** : Chapter 13  
**Chibwe, Malama K.**  
**Debtors/ Respondents** : 20-10465

**Debtor's Response to Certification of Default**

Debtor, Malama K. Chibwe, by and through his undersigned attorney, hereby provides the following answers to the **CERTIFICATION OF DEFAULT** filed by Wilmington Trust, National Association, not in its Individual Capacity, but solely as Trustee for MFRA Trust 2014-2 ("Movant"). These responses are made without prejudice to debtor's right to present additional facts or contentions at a hearing based upon information hereinafter obtained or evaluated. Debtor specifically reserves the right to supplement or amend his responses or present additional facts and contentions at a later date to any of the answers given.

1. -5. Denied. The averments contained in these Paragraphs consist of mischaracterization or summarization of documents that speak for themselves and they are denied as no response is required.

6. Denied. As of the date of the Certification of Default, the debtor has remedied or is prepared to remedy whatever problem served as grounds for relief in respect to the Stipulation, if any ever existed.

7. Denied. The averment contained in this Paragraph consist of mischaracterization or summarization of documents that speak for themselves and they are denied as no response is required.

8. Denied. As of the date of the Certification of Default, the debtor has remedied or is prepared to remedy whatever problem served as grounds for relief in respect to the Stipulation, if any ever existed.

9. Denied. The averments contained in this Paragraph consist of mischaracterization or summarization of documents that speak for themselves and they are denied as no response is required.

For the reasons set forth above, among others, and based on this Court's authority under the Bankruptcy Code, the Debtor prays that the request for relief be denied and such other relief as is just and proper. The Debtor specifically reserves the right to supplement the response at or prior to the hearing thereon.

Dated: July 21, 2020

"/s/" Mitchell J. Prince  
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